

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

RED RIVER TALC LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**SUPPLEMENTAL DECLARATION OF KATHRYN TRAN IN SUPPORT OF
DEBTOR'S EMERGENCY EX PARTE APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF EPIQ CORPORATE
RESTRUCTURING, LLC AS CLAIMS, NOTICING AND SOLICITATION AGENT**

(Related to Docket Nos. 19, 39)

I, Kathryn Tran, being first duly sworn, deposes and states as follows:

1. I am a Consulting Director at Epiq Corporate Restructuring, LLC (“Epiq”), with offices at 777 Third Avenue, 12th Floor, New York, New York 10017. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. I submit this supplemental declaration to supplement the disclosures set forth in the *Declaration of Kathryn Tran in Support of Debtor's Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent* (the “Declaration”), which Declaration was attached as Exhibit B to the *Debtor's Emergency Ex Parte Application for Entry*

¹ The last four digits of the Debtor's taxpayer identification number are 8508. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

of an Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent [Dkt. 19] (the “Application”).²

3. Epiq continues to serve as the claims and noticing agent, as needed, in the case of In re LTL Management LLC, No. 23-12825 (MBK) (Bankr. D.N.J.) pursuant to the terms of the engagement letter dated as of April 4, 2023 (the “LTL Engagement Letter”). The LTL Engagement Letter was allocated to Pecos River Talc LLC as a result of the 2024 Corporate Restructuring.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: December 9, 2024

/s/ Kathryn Tran
Kathryn Tran
Epiq Corporate Restructuring, LLC
Consulting Director
777 Third Avenue, 12th Floor
New York, New York 10017

² Capitalized terms used herein but not otherwise defined have the meanings given to them in the Application. On September 21, 2024, the Court entered the *Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent* [Dkt. 39] (the “Retention Order”). The Coalition of Counsel for Justice for Talc Claimants and the United States Trustee for the Southern District of Texas have filed motions for reconsideration of the Retention Order. See Dkts. 257, 300.

Certificate of Service

I certify that on December 9, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins

John F. Higgins